

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

WINFRED MUCHIRA,

Plaintiff,

v.

HALAH AL-RAWAF, et al.,

Defendants.

Civil Action No. 1:14-cv-00770
(AJT/JFA)

**DEFENDANTS' RENEWED MOTION FOR
DISCOVERY SANCTIONS AND MOTION FOR SPOILIATION SANCTIONS**

Introduction and Summary

Defendants Halah Alrawaf, Ibraheem Alrashoudi, Fahad Alrashoudi, and Luluh Alrashoudi (collectively, the "Saudi Family"), by and through counsel, hereby renew their motion for discovery sanctions and also move this Court for sanctions for the spoliation of evidence under Fed. R. Civ. P. 37 and Local Civil Rule 37 and this Court's inherent authority.

Dated: February 25, 2015

Respectfully submitted,

/s/ Jay M. McDannell

Jay M. McDannell (VA Bar No. 45630)

Luisa Caro (*admitted pro hac vice*)

Erica Mueller

Potomac Law Group, PLLC

1300 Pennsylvania Avenue, N.W., Suite 700

Washington, DC 20004

Telephone: 703-718-0171

Email: jmcdannell@potomacclaw.com

Neil H. Koslowe (*admitted pro hac vice*)

Shearman & Sterling LLP

801 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: 202-508-8118
Email: neil.koslowe@shearman.com
Attorneys for Defendants

CERTIFICATE OF CONSULTATION AMONG COUNSEL

Pursuant to Local Civil Rules 7(E) and 37(E), I certify that counsel for Defendants have conferred with counsel for Plaintiff on multiple occasions about the issues found in this Motion in a good faith effort to resolve the discovery matters at issue in this motion.

/s/ Jay M. McDannell
Jay M. McDannell (VA Bar No. 45630)
Potomac Law Group, PLLC
1300 Pennsylvania Avenue, N.W.
Suite 700
Washington, DC 20004
Telephone: 703-718-0171
Email: jmcdannell@potomacclaw.com

CERTIFICATE OF SERVICE

I certify that today, February 25, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send a notification of such filing (NEF) to the following:

Deborah Anne Yates
Wilmer Cutler Pickering Hale & Dorr, LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Email: deborah.yates@wilmerhale.com

/s/ Jay M. McDannell
Jay M. McDannell (VA Bar No. 45630)
Potomac Law Group, PLLC
1300 Pennsylvania Avenue, N.W.
Suite 700
Washington, DC 20004
Telephone: 703-718-0171
Email: jmcdannell@potomacclaw.com